

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

C.A. No. 05-10490 NMG

NANCY BUCKLEY,)
Plaintiff)
)
v.)
)
CITY OF BROCKTON)
SCHOOL DEPARTMENT,)
Defendant)

DEFENDANT’S PRE-TRIAL WITNESS AND EXHIBIT LIST
PURSUANT TO FED R. Civ. P. 26(a)(3)

WITNESSES

1. Nancy Buckley
138 Falconer Avenue
Brockton, MA 02301\
508-586-7217
2. Joseph Bage
221 Oak Street
Brockton, MA 02301
3. Robert Uto
222 Myrtle Street
Brockton, MA 02301
508-580-7463 - work
508-583-0693 – home
4. MaryBeth McManus
97 Boylston Street
Brockton, MA 02301
508-580-4366 - work
508-587-1298 – home

5. Joseph Whiton
47 Gretter Road
Roslindale, MA 02131
508-580-7411 - work
617-327-2529 – home
6. Kathleen Sirois
71 Carroll Avenue
Brockton, MA 02301
508-580-7535 - work
508-584-4178 – home
7. Susan Szachowicz
36 Tucker Drive
Brockton, MA 02301
508-580-7633 – work
8. Michelle Finnegan
55 Quail Street
W. Roxbury, MA 02132
508-580-7463 - work
617-327-3789 – home
9. Deidre Smith
22 Meadow Lane
Bridgewater, MA 02324
508-580-7431 - work
508-697-6320 – home
10. Deborah Feldman
145 Cliffwood Lane
W. Falmouth, MA 02574
508-580-7406 - work
11. Jane Malatesta
29 Slocum Road
Jamaica Plain, MA 02130
617-524-3240 – home
12. Maria LeFort
2 Laurel Hill Court
Bourne, MA 02532

508-894-4536 – home

13. Thomas Malinowski
c/o Brockton Education Association
410 Forest Avenue
Brockton, MA 02301
14. Alan Jolly
47 Barden Hill Road
Middleboro, MA 02346
508-580-7431 - work
508-947-8834 – home
15. Jean Ryan
97 Boylston Street
Brockton, MA 02301
508-894-4400 - work
508-587-1298
16. Eugene Marrow
128 Healy Terrace
Brockton, MA 02301
(508) 584-0726
17. Sharon Wolder
132 Coventry Circle
Brockton, MA 02301
(508) 584-3977
18. Laura Miceli
8 Richfield Street
Quincy, MA 02171
(617) 571-3478
19. Barbara Sousa
220 Myricks Street
East Taunton, MA 02718

EXHIBITS

1. March 1, 2004 Job Posting for two open Housemaster Positions at Brockton High School

2. Brockton Schools Job Description of Housemaster
3. List of applicants for 2004 Housemaster
4. Document entitled "Review of Applicants for Administrative Positions" (list of individuals chosen for housemaster interviews)
5. Rejection Letters to 1st Group of Applicants
6. March 12, 2004 cover letter from Nancy Buckley
7. 2004 Personnel File of Nancy Buckley
8. Nancy Buckley's 2004 Application for Housemaster
9. 2004 Resume of Nancy Buckley
10. Nancy Buckley's Department of Education Educator's Licenses/Certifications as of 2004 application for housemaster
11. Sept 4, 1986 - Letter to plaintiff from the Brockton Public Schools regarding the plaintiff's application for Assistant Principal at North Junior High School
12. Aug 3, 1988 – Letter to plaintiff from the Brockton Public Schools regarding the plaintiff's application for Assistant Principal at South Junior High School
13. May 30, 1991 – Letter to plaintiff from the Brockton Public Schools regarding the plaintiff's application for Principal at North Junior High School
14. Aug 29, 1991– Letter to plaintiff from the Brockton Public Schools regarding the plaintiff's application for Assistant Principal at North Junior High School
15. May 27, 1992- Letter to plaintiff from the Brockton Public Schools regarding the plaintiff's application for Assistant Housemaster at Brockton High School
16. Aug. 30, 1994 - Letter to plaintiff from the Brockton Public Schools regarding the plaintiff's application for Assistant Principal at West Junior High School
17. July 3, 2003 - Letter to plaintiff from the Brockton Public Schools regarding the plaintiff's application for Housemaster at Brockton High School
18. May 20, 2003 (should read 2004) - Letter to plaintiff from the Brockton Public Schools regarding the plaintiff's application for Housemaster at Brockton High School

19. March 12, 2004 Cover letter from Alan Jolly
20. Alan Jolly's 2004 Application for Housemaster
21. 2004 Personnel File of Alan Jolly
22. 2004 Resume of Alan Jolly
23. Alan Jolly's Department of Education Educator's Licenses/Certifications as of 2004 application for housemaster
24. Document entitled "Interview Team"
25. Disclosure Statement (Confidentiality Statement) signed by Advisory Committee
26. John Whiton's Advisory Committee Materials from May 2004 Housemaster Interviews:
 - a. Interview Rating Sheets front & back
 - b. Document entitled "Questions for Applicants"
 - c. Document entitled "Interviews" (list of applicant names & times)
27. Deirdre Smith's Advisory Committee Materials from May 2004 Housemaster Interviews:
 - a. Interview Rating Sheets front & back
 - b. Document entitled "Questions for Applicants"
 - c. Document entitled "Interviews" (list of applicant names & times)
28. Maria LeFort's Advisory Committee Materials from May 2004 Housemaster Interviews:
 - a. Interview Rating Sheets front & back
 - b. Document entitled "Questions for Applicants"
 - c. Document entitled "Interviews" (list of applicant names & times)
29. Jane Malatesta's Advisory Committee Materials from May 2004 Housemaster Interviews:
 - a. Interview Rating Sheets front & back
 - b. Document entitled "Questions for Applicants"
 - c. Document entitled "Interviews" (list of applicant names & times)
30. Deborah Feldman's Advisory Committee Materials from May 2004 Housemaster Interviews:
 - a. Interview Rating Sheets front & back
 - b. Document entitled "Questions for Applicants"
 - c. Document entitled "Interviews" (list of applicant names & times)

31. Kathleen Sirois' Advisory Committee Materials from May 2004 Housemaster Interviews:
 - a. Interview Rating Sheets front & back
 - b. Document entitled "Questions for Applicants"
 - c. Document entitled "Interviews" (list of applicant names & times)
32. May 6 2004 Letter to Joseph Bage from Kathleen Sirois describing preliminary outcome of housemaster interviews.
33. May 20, 2003 (sic) letter to plaintiff regarding May 2004 housemaster position
34. Announcement letter (5/21/2004) of the promotion of Alan Jolly and Sharon Wolder to Housemaster.
35. Brockton Public School Committee Policy Manual: Personnel Section (G)

The Defendant reserves the right to supplement this list.

THE DEFENDANT
By its Attorneys

/s/ Frank A. Smith, III
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